

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

YAACOV APELBAUM, a New York resident,
and XRVISION, LTD., a New York corporation,

Case No. 2:23-cv-11718

Hon. Stephen J. Murphy,

III

Plaintiffs,

v.

STEFANIE LAMBERT, a Michigan resident, and
THE LAW OFFICE OF STEFANIE L. LAMBERT, PLLC,
A Michigan professional limited liability company
And BILL BACHENBERT, a Pennsylvania resident,

Defendants.

BURNS LAW FIRM

John C. Burns*

Attorneys for Plaintiffs

PO Box 191250

St. Louis, Missouri 63119

(314) 329-5040

TBLF@pm.me

*admission to the Eastern District

Of Michigan pending

STUART LAW, PLC

Todd A. Stuart

Attorneys for Plaintiffs

429 Turner Ave. NW

Grand Rapids, MI 49504

(616) 284-1658

tstuart@stuartlawplc.com

**THE LAW FIRM OF MICHAEL J.
SMITH AND ASSOCIATES, PLLC**

Michael J. Smith (P36706)

Jamal R. Harris (P63835)

John H. Mott (P81990)

Attorneys for Defendant

70 Macomb Place, Suite 200

Mt. Clemens, MI 48043

(586) 254-0200

msmith@mikesmithlaw.com

jharris@mikesmithlaw.com

jmott@mikesmithlaw.com

JOINT MOTION FOR SECOND AMEND SCHEDULING ORDER

The parties in the above-captioned matter respectfully move this Honorable Court to amend the Amended Scheduling Order in this matter, dated July 23, 2024, as set forth below. The parties exchanged their respective responses to Requests for Production of Documents on December 6, 2024. Additionally, Plaintiffs are seeking a protective order to produce documents in response to Defendant's request given the sensitive and/or privileged nature of said documents. It is understood that there are more than 900 pages of documents to be produced, of which will necessarily require time to properly examine. On December 18, 2024, Plaintiffs provided their responses to Defendant's Interrogatories and Request for Admissions. Given the nature of the claims and defenses asserted in this matter, the parties stipulate and jointly request the Amended Scheduling Order below be entered by this Honorable Court to allow adequate time to secure a protective order, review the voluminous discovery, and address any remaining issues.

Accordingly, the parties hereby jointly move the Court for the following adjustment to the Amended Scheduling Order:

WITNESS LIST DISCLOSURE DUE:	2/12/25
EXPERT WITNESS DISCLOSURE DUE:	90 days before Trial
DISCOVERY ENDS:	4/23/25

DISPOSITIVE MOTIONS DUE:	5/21/25
JOINT FINAL PRETRIAL ORDER DUE:	1 week before PTC
FINAL PRETRIAL CONFERENCE:	10/6/25
MOTIONS IN LIMINE DUE:	10 days before Trial
TRIAL BRIEFS and PROPOSED JURY INS. DUE:	5 days before Trial
TRIAL:	10/20/25

Respectfully submitted,
THE LAW FIRM OF MICHAEL J. SMITH
AND ASSOCIATES, PLLC

/s/ Michael J. Smith
Michael J. Smith (P36706)
Jamal R. Harris (P63835)
John H. Mott (P81990)
Attorney for Defendant BACHENBERG
70 Macomb Place, Suite 200
Mt. Clemens, Michigan 48043
(586) 254-0200

Attorneys for Plaintiffs

/s/ John C. Burns
BURNS LAW FIRM
John C. Burns*
Attorneys for Plaintiffs
PO Box 191250
St. Louis, Missouri 63119
(314) 329-5040
TBLF@pm.me

THE LAW FIRM OF MICHAEL J. SMITH AND ASSOCIATES, PLLC (586) 254-0200